

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1(b)

PACHULSKI STANG ZIEHL & JONES LLP

Laura Davis Jones
Colin R. Robinson
Peter J. Keane
919 N. Market Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
crobinson@pszjlaw.com
pkeane@pszjlaw.com

Counsel to Arnold & Itkin LLP

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 23-12825 (MBK)

Hearing Date and Time:
May 22, 2023 at 10:00 a.m. (ET)

NOTICE OF MOTION TO DISMISS BANKRUPTCY CASE

PLEASE TAKE NOTICE that, on May 22, 2023 at 10:00 a.m., or as soon thereafter as counsel may be heard, the law firm of Arnold & Itkin LLP (“Arnold & Itkin”), on behalf of certain personal injury claimants represented by Arnold & Itkin (the “Movants”), through its undersigned counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order dismissing this case

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

pursuant to section 1112(b) of the Bankruptcy Code and Rule 1017 of the Federal Rules of Bankruptcy Procedure (the “Motion”).

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, Arnold & Itkin will rely upon the declaration of Laura Davis Jones and the memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) Arnold & Itkin’s undersigned counsel, (b) Debtor’s counsel, (c) the proposed counsel to the Official Committee of Talc Claimants, (d) the United States Trustee, and (e) any other party entitled to notice no later than seven (7) days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: May 1, 2023

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Colin R. Robinson

Laura Davis Jones

Colin R. Robinson

Peter J. Keane

919 N. Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: ljones@pszjlaw.com

crobinson@pszjlaw.com

pkeane@pszjlaw.com

Counsel for Arnold & Itkin LLP